

NOLAN LAW GROUP

MEMO ENDORSED

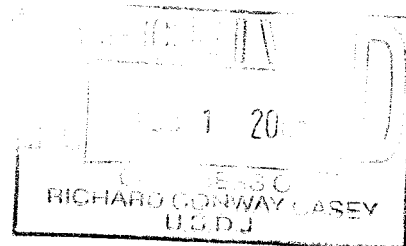
20 BROADWAY, 4TH FLOOR, NEW YORK, NY 10007-1312 • TEL: (212) 691-1000 • FAX: (212) 691-1001

VIA MAILING LABEL • AIR MAIL • DELIVERY • DELIVERY • DELIVERY

NEW YORK, NY 10007-1312 • TEL: (212) 691-1000 • FAX: (212) 691-1001

August 11, 2005

Via Federal Express Overnight Delivery



Hon. Richard Conway Casey
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street - Room 1350
New York, NY 10007-1312

RE: *In Re Terrorist Attacks of September 11, 2001 - MDL No. 1570 (RCC):*
Burnett v. Al Baraka Investment & Development, et al.
Case No. 03 CV 9849 (RCC)
Gladys Salvo, et al. v. Al Qaeda Islamic Army, et al.
Case No. 03 CV 5071 (RCC)

Dear Judge Casey:


We are writing to request Your Honor's permission to consolidate the *Salvo* case with *Burnett*; each case contains identical facts, legal issues, and named defendants. The *Salvo* complaint was filed in the Southern District of New York on July 8, 2003. *Salvo* was subsequently consolidated with the MDL action (03-MDL-1570) on December 9, 2003.

In the interest of judicial economy, we respectfully request that all prior and forthcoming docket entries (e.g., motions, orders, stipulations) filed in *Burnett* also apply retroactively and concurrently with *Salvo*. Your Honor has already endorsed a similar request from the *Ashton* plaintiffs on December 6, 2004.

Accordingly, we respectfully request Your Honor's endorsement of this proposed Order of Consolidation.

Respectfully submitted,

NOLAN LAW GROUP


Floyd A. Wisner

FAW/plj
cc: All Counsel (via email)

MAIL ROOM

DONALD L. NICHOLS • ALBERT S. BARNETT • DAVID A. CONWAY • FLOYD A. WISNER • JAMES J. CONWAY • JAMES J. CONWAY
ORLANDO, FLORIDA • SUITE 1000 • 1000 • 1000 • 1000 • 1000 • 1000



SO ORDERED:

Richard C. Casey
U.S. District Court Judge

August 16, 2005